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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CINDY GUERRERO,

Plaintiff,

v.

MERCURY CASUALTY COMPANY,
a California Corporation; DOES I-X,
inclusive; and ROE CORPORATIONS
I-X,

Defendants.

Case No.: 3:24-cv-00390-ART-CSD

**JOINT DISCOVERY PLAN AND
SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

Plaintiff CINDY GUERRERO, by and through her counsel, ROBERT R. JENSEN, of the law firm JENSEN PERSONAL INJURY LAW, LLC., and Defendant MERCURY CASUALTY COMPANY by through their counsel, DAVID M. ZANIEL, ESQ. of the law firm RANALLI, ZANIEL, FOWLER & MORAN, LLC., hereby submit this Proposed Joint Discovery Plan and Scheduling Order.

Fed.R.Civ.P. 26(f) Conference.

Counsel for the parties participated in the FRCP 26(f) conference on September 18, 2024. There were no discovery disputes at that time. The parties agree to exchange their respective initial disclosures statements in a timely manner. After considering the evidence in this case, counsel for the parties believe that nine months will be needed to complete discovery and prepare for trial. P. 26(f) conference to complete discovery.

1. Discovery Cut-Off Date: the parties request that August 18, 2025 be the

1 discovery cut-off date.

2 **2. Amending the Pleadings and Adding Parties:** The parties request that all
3 motions to amend the pleadings or to add parties be filed no later than May 20, 2025.

4 **3. Fed.R.Civ. 26(a)(2) Disclosures (Experts):** The parties request that the
5 disclosure of experts be made on or before June 19, 2025– 60 days before the proposed
6 discovery cut-off date. Disclosure of rebuttal experts shall be made by July 18, 2025 – 30
7 days after the initial disclosure of experts.

8 **4. Interim Status Report:** Under the recent changes in the rules, the parties
9 will not file an interim status report previously required by LR 26-3.

10 **5. Dispositive Motions:** The date for filing dispositive motions shall be no later
11 than September 17, 2025 – 30 days after the discovery cutoff date.

12 **6. Pretrial Order:** The date for filing the Joint Pretrial Order shall be not later
13 than October 17, 2025, 30 days after the date for filing dispositive motions. In the event the
14 dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended
15 until 30 days after decision on the dispositive motions, or until further order of the court.
16 In the further event that the discovery period is extended from the discovery cut-off date set
17 forth in the Discovery Plan and Scheduling Order, the date for filing the Joint Pretrial Order
18 shall be extended in accordance with the time period set forth in this paragraph.

19 **7. Fed.R.Civ.26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
20 26(a)(3), and any objections thereto, shall be included in the Joint Pretrial Order.

21 **8. Alternative Dispute Resolution:** Counsel for the parties certify that they
22 have met and conferred about the possibility of using alternative dispute resolution
23 processes, including mediation, arbitration and/or early neutral evaluation. The parties
24 agree that an early neutral evaluation would not be effective at this time, as the parties and
25 their counsel believe that it is necessary to conduct discovery before attempting to resolve
26 this case. Counsel further agreed that a settlement conference may be beneficial after
27 discovery is concluded. Finally, the parties and their counsel are not interested in
28 submitting this case to mediation

9. Electronic Evidence: The party certify that they have discussed and intend

1 to use electronic evidence at the trial of this matter and will ensure that electronic evidence
2 is in a format compatible with the Court's electronic jury evidence display system. At
3 present, the parties have not agreed upon any stipulations regarding the use of electronic
4 evidence, but will address this issue again in the pretrial order.

5 **10. Extensions or Modifications of the Discovery Plan and Scheduling Order:**
6 any stipulation or motion must be made no later than 21 days before the subject deadline.
7 Request to extend discovery deadlines must be in full compliance with LR 26-3.

8 Respectfully submitted this 27th day of September, 2024.

9 JENSEN PERSONAL INJURY LAW, LLC.

10 /s/ Robert R. Jensen
11 ROBERT R. JENSEN, ESQ.
12 203 S. Arlington Avenue
13 Reno, Nevada 89501
14 Attorney for Plaintiff

15 RANALLI, ZANIEL, FOWLER & MORAN, LLC.

16 /s/ David M. Zaniel
17 DAVID M. ZANIEL, ESQ.
18 50 W. Liberty Street, Suite 1050
19 Reno, Nevada 89501
20 Attorney for Defendants

21 IT IS SO ORDERED.

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: October 11, 2024
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